

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
EASTERN DIVISION

CORBEY JONES; ESTATE OF ANDREW  
WESLEY JONES

PLAINTIFFS

VERSUS

Civil Action No. 2:22-cv-93-KS-MTP

JONES COUNTY, MS, ET AL.

DEFENDANTS

**\*EXPEDITED CONSIDERATION REQUESTED\***

**SHERIFF JOE BERLIN AND JENNIFER HENDERSON'S  
UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLY**

Come now Sheriff Joe Berlin and Jennifer Henderson (collectively "Movants"), by and through counsel, and respectfully move this Court for an extension of **seven (7) days** in which to submit their Reply to Plaintiffs' Response in Opposition to Movant's Second Motion for Judgment on the Pleadings based on Qualified Immunity [106, 107]. In support of the same, Movants would show unto the Court, as follows:

1. Movants filed their Second Motion for Judgment on the Pleadings based on Qualified Immunity [101] and supporting Memorandum of Authorities [102] on October 26, 2023. Plaintiffs filed their Response in Opposition [106, 107] ("Response") on November 9, 2023, which makes Movants' Reply due today, November 16, 2023.

2. Despite due diligence on the part of the undersigned counsel, Movants will be unable to meet their current brief deadline as undersigned counsel has been addressing separate matters, both in and outside of the office. In addition, undersigned counsel has communicated the need for this extension to counsel for Plaintiffs, who has

represented no opposition to additional time being granted, although Plaintiffs requested Movants to submit their Reply before expiration of the seven-day-extension, if possible.

3. Showing good cause for an enlargement of time is key to a request for the same. The undersigned is engaged in a robust federal and state practice, with matters pending in various chancery, circuit, and district courts throughout Mississippi. The undersigned has read and reviewed Plaintiffs' Response, and has started drafting Movants' Reply, but will be unable to meet the current brief deadline, in part due to the undersigned's caseload as well as addressing the specific intricacies of arguments briefed thus far.

4. Movants submit that they request the extension herein in good faith, for good cause, and nor for the purposes of harassment or delay. Furthermore, no party will be prejudiced by the requested extension as this matter is currently stayed due to the primary pending-Motion's underlying subject matter, *i.e.* qualified immunity.

5. Considering the above, Movants respectfully request this Court extend the current deadline by **seven (7) days until November 23, 2023**, to allow the undersigned counsel time to adequately prepare Movants' Reply to Plaintiffs' Response in Opposition to Movants' Second Motion for Judgment on the Pleadings based on Qualified Immunity.

6. Due to the simple and self-explanatory nature of this Motion, Movants respectfully request the Court relieve them of any obligation to submit a supporting memorandum of authorities.

WHEREFORE, PREMISES CONSIDERED, Defendants, Sheriff Joe Berlin and Jennifer Henderson, respectfully request this Court extend the date on which their Reply

to Plaintiffs' Response in Opposition to Movants' Second Motion for Judgment on the Pleadings based on Qualified Immunity is due by seven (7) days, or until November 23, 2023.

**DATE: November 16, 2023.**

Respectfully submitted,

**SHERIFF JOE BERLIN, AND  
JENNIFER HENDERSON**

By: /s/ Lance W. Martin  
One of Their Attorneys

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CERTIFICATE

I, the undersigned of Allen, Allen, Breeland & Allen, PLLC, one of the attorneys for Defendants Sheriff Joe Berlin and Jennifer Henderson, hereby certify that on this day, I filed the foregoing Motion for Extension of Time to File Reply with the Clerk of the Court using the ECF system, which gave notice of the same to the following:

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This, the 16th day of November, 2023.

/s/Lance W. Martin  
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